I want to comment on how significant TRS is to us. I make hundreds of calls weekly and when I started trying using VRS...all of sudden the hearing recipients of my calls love VRS because it makes the call more smoothly and natural for them. The conversation via VRS is much shorter than via TRS because TTYs can accept up to 50 words per minute and I type more than 95 WPM. VIa VRS, the minutes are much shorter because I use sign language instead of typing. Regarding the rate per minute, I am recommending that FCC asks NECA to do a study on how much rate should be because vendors have different needs and capabilites. Right now the VRS is NOT functionally equivalent to me because I have to wait more than 15 minutes for a VRS operator to respond which is totally unacceptable. FCC is actually failing its responsibility to abide by Americans with Disabilities Act, Title 4 to make telecommunications FUNCTIONALLY EQUIVALENT to us all..

Thus, please abide by the law and make it functionally equivalent to all of us.